

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

GEORGE MASON, )  
vs. )  
Plaintiff, )  
vs. )  
AMERICAN INTERNATIONAL GROUP, )  
INC.; AMERICAN GENERAL )  
CORPORATION; AMERICAN GENERAL )  
FINANCE, INC.; CREDIT CENTERS, INC., )  
d/b/a AMERICAN GENERAL FINANCE, )  
INC.; MERIT LIFE INSURANCE )  
COMPANY; YOSEMITE INSURANCE )  
COMPANY; KATHIE ROWELL; and )  
Fictitious Defendants "A", "B", and "C", )  
whether singular or plural, those other persons, )  
corporations, firms, or other entities whose )  
wrongful conduct caused the injuries and )  
damages to the Plaintiff, all of whose true and )  
correct names are unknown to Plaintiffs at this )  
time, but will be substituted by amendment )  
when ascertained, )  
Defendants. )  
CIVIL ACTION NO.: CV-05-752

**NOTICE OF FILING AFFIDAVITS IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

COME NOW Defendants American International Group, Inc. and American General Corporation, and appearing specially to contest personal jurisdiction, hereby submit the Affidavits of Steven M. Dixon and Linda Sanchez in further support of their Motion to Dismiss due to this Court's lack of personal jurisdiction over Defendants American International Group, Inc. and American General Corporation.<sup>1</sup>

Respectfully submitted,

<sup>1</sup> In filing this notice, American International Group and American General Corporation do not waive and specifically preserve their defense of failure to state a claim upon which relief can be granted, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

s/ John Thomas A. Malatesta  
Jeffrey M. Grantham (ASB-4866-M66J)  
Thomas J. Butler (ASB-7790-T75T)  
John Thomas A. Malatesta, III (ASB-4646-O70M)  
Attorneys for Defendants American International  
Group, Inc. and American General Corporation

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.  
2400 AmSouth/Harbert Plaza  
1901 Sixth Avenue North  
Birmingham, Alabama 35203-2618  
205-254-1000  
205-254-1999 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by U. S. Mail, postage prepaid, on this the 30<sup>th</sup> day of August, 2005:

C. Lance Gould, Esq.  
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.  
272 Commerce Street  
Montgomery, AL 36104

David Alan Elliott, Esq.  
BURR & FORMAN LLP  
SouthTrust Tower, Suite 3100  
420 – 20<sup>th</sup> Street, North  
Birmingham, AL 35203

s/ John Thomas A. Malatesta  
OF COUNSEL